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10  
11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 DUSTIN NEFF,  
14 Plaintiff,  
15 v.  
16 SBA ENTERTAINMENT, LLC, et al.,  
17 Defendants.

18 Case No. 5:23-cv-02518-EKL  
19 *Hon. Eumi K. Lee Presiding*  
20  
21 **REQUEST FOR ENTRY OF**  
22 **DEFAULT AGAINST**  
23 **DEFENDANT GOODE**  
24 **ENTERPRISE SOLUTIONS INC.**

1                   **TO THE CLERK OF THIS COURT:**

2                   Plaintiff Dustin Neff respectfully requests that the Clerk of this Court enter  
3 default in this case against Defendant Goode Enterprise Solutions Inc.  
4 (“Defendant”), a Colorado corporation on the grounds that Defendant has failed to  
5 retain counsel as Ordered by the Court (Dkt. 61) and has risked default being  
6 entered against it.

7                   Neff served the First Amended Complaint and Amended Summons on  
8 Defendant (Dkt. 44). To date, Defendant has not filed a response to the FAC, and  
9 its timing for filing a response has expired and default should be entered. *See*  
10 Burroughs Decl. ¶¶ 2-4.

12 Dated: January 5, 2026

Respectfully submitted,

13                   By: /s/ Scott Alan Burroughs  
14                   Scott Alan Burroughs, Esq.  
15                   Andres Navarro, Esq.  
16                   DONIGER / BURROUGHS  
17                   *Attorneys for Plaintiff*

## **DECLARATION OF SCOTT ALAN BURROUGHS**

I, Scott Alan Burroughs, do declare and say as follows:

1. I am above eighteen (18) years of age and not a party to this action. I am a partner with Doniger / Burroughs APC, and am counsel for Plaintiff Dustin Neff in this action. I am able to competently testify to the following if called upon to do so.

2. Neff has filed this action for copyright infringement against Defendant Goode Enterprise Solutions Inc. (“Defendant”), a Colorado corporation and filed a First Amended Complaint (“FAC”) (Dkt 38).

3. My firm served the FAC and Amended Summons in this action on Defendant. Dkt. 44.

1. To date, Defendant has not filed a response to the FAC, and its time period for doing so expired and default should be entered per Fed. R. Civ. P. 55(a).

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on January 5, 2026.

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs, Esq.  
Declarant